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July 15, 2005

BY HAND DELIVERY

Edward D. Ryan
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Letter dated June 15, 2005, regarding 12 Day Pre-General Report (10/1/04-10/13/04)

Dear Mr. Ryan:

On behalf my client, the Republican Party of Louisiana ("the Party"), I am writing in response to the Commission's letter dated June 15, 2005, regarding the Party's 12 Day Pre-General Report (10/1/04-10/13/04). Please note that the Party filed an amendment to the Pre-General Report on July 8, 2005. The amendment addressed an issue raised by the Commission concerning the August Monthly Report (7/1/04-7/31/04).

First, the Commission asked the Party to classify two receipts listed on Line 17 of the original Pre-General Report. On October 4, 2004, Bush-Cheney 2004, Inc. transferred \$200,000 in excess campaign funds to the Party. On October 12, 2004, The Billy Tauzin Congressional Committee transferred \$150,000 to the Party. The Federal Election Campaign Act, as amended, permits principal candidate committees to transfer unlimited sums to state political parties. See 2 U.S.C. § 439a; 11 C.F.R. § 113.2(c). Therefore, the Party properly listed the receipts on Line 17. For additional clarification, the Party has designated each itemization a "transfer of excess funds" on the amendment to the Pre-General Report.

Second, the Commission requested a clarification of the terms "Admin - Professional Services, FEA Consulting, and Professional Services," which the Party used to describe disbursements listed on Schedule B and Schedule H4 of its original Pre-General Report. The Party's report listed ten disbursements with these descriptions:

- A \$6,250 payment to Sentinal 21 on October 6, 2004 for "FEA Consulting." The Party's amendment explains that the purpose of this disbursement was for "Volunteer Coordination." This disbursement was not on behalf of any specifically identified federal candidate.

- A \$2,000 payment to Direct Mailing Service, Inc. on October 7, 2004 for "FEA Consulting." The Party's amendment explains that the purpose of this disbursement was for "Strategy Consulting." This disbursement was not on behalf of any specifically identified federal candidate.
- A \$500 payment to Sean Riecke on October 11, 2004 for "FEA Consulting." The Party's amendment explains that the purpose of this disbursement was for a "Grassroots Coordinator." This disbursement was not on behalf of any specifically identified federal candidate.
- A \$1,000 payment to SSW and Associates on October 8, 2004 for "FEA Consulting." The Party's amendment explains that the purpose of this disbursement was for a "Grassroots Coordinator." This disbursement was not on behalf of any specifically identified federal candidate.
- A \$200 payment to Catherine Clifford on October 6, 2004 for "Admin – Professional Services." The Party's amendment explains that the purpose of this disbursement was for "Janitorial Services." This disbursement was not on behalf of any specifically identified federal candidate.
- A \$200 payment to Anna Thompson on October 6, 2004 for "Admin – Professional Services." The Party's amendment explains that the purpose of this disbursement was for "Clerical Services." This disbursement was not on behalf of any specifically identified federal candidate.
- A \$450 payment to Connor Best on October 6, 2004 for "Admin – Professional Services." The Party's amendment explains that the purpose of this disbursement was for "Clerical Services." This disbursement was not on behalf of any specifically identified federal candidate.
- A \$140 payment to Jeanne Leveque on October 6, 2004 for "Admin – Professional Services." The Party's amendment explains that the purpose of this disbursement was for "Clerical Services." This disbursement was not on behalf of any specifically identified federal candidate.
- A \$330.50 payment to Catherine Clifford on October 6, 2004 for "Admin – Professional Services." The Party's amendment explains that the purpose of this disbursement was for "Janitorial Services." This disbursement was not on behalf of any specifically identified federal candidate.
- A \$2,000 payment to Postlethwaite & Netterville on October 6, 2004 for "Admin – Professional Services." The Party's amendment explains that the purpose of this

disbursement was for "Accounting Services." This disbursement was not on behalf of any specifically identified federal candidate.

Finally, the Commission has asked the Party to clarify all expenditures made for a "Facility Rental" on Schedule B and Schedule H of the original Pre-General Report.

- On Schedule B, the Party's report listed a \$2,750 payment to 401 Veterans Limited on October 1, 2004. The purpose of the disbursement was listed as a "Facility Rental." In response to the Commission's request, the Party has amended the purpose of disbursement to clarify that the payment was for an office rental. The Party did not rent the office on behalf of any specifically identified federal candidate.
- On Schedule B, the Party's report listed a \$3,000 payment to MPW Properties on October 5, 2004. The purpose of the disbursement was listed as a "Facility Rental." In response to the Commission's request, the Party has amended the purpose of disbursement to clarify that the payment was for an office rental. The Party did not rent the office on behalf of any specifically identified federal candidate.
- On Schedule H4, the Party's report listed a \$1,286 payment to Jacquin Grand Children, LLC on October 1, 2004. The purpose of the disbursement was listed as a "Facility Rental." In response to the Commission's request, the Party has amended the purpose of disbursement to clarify that the payment was for an office rental. The Party did not rent the office on behalf of any specifically identified federal candidate.
- On Schedule H4, the Party's report listed a \$1,925 payment to R&C Properties, LLC on October 1, 2004. The purpose of the disbursement was listed as a "Facility Rental." In response to the Commission's request, the Party has amended the purpose of disbursement to clarify that the payment was for an office rental. The Party did not rent the office on behalf of any specifically identified federal candidate.
- On Schedule H4, the Party's report listed a \$44 payment to The Storage Center on October 6, 2004. The purpose of the disbursement was listed as a "Facility Rental." In response to the Commission's request, the Party has amended the purpose of disbursement to clarify that the payment was for office storage rental. The Party did not rent the storage space on behalf of any specifically identified federal candidate.

From June 8, 2005, through July 8, 2005, the Commission delivered a total of thirteen letters to the Party, each asking numerous specific questions about the Party's 2004 campaign finance disclosures. Eight of the letters listed deadlines for July 15, 2005. To date, the Party has filed eight report amendments in response to these inquiries. Although this reply does not address *some* of the issues raised by the Commission's July 15 letters, we have worked diligently to investigate each matter, and will continue to do so in order to ensure accurate reporting. Because of the Party's obligation to certify that each report is "true, correct and complete," it is

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inappropriate for the Party to submit additional amended reports at this time. The Party will submit necessary amendments in the coming days after concluding its investigation of questions raised by the Commission.

If you have questions or require additional information, please do not hesitate to contact me at (202) 756-8003.


Sincerely,

A handwritten signature in black ink, appearing to read "Bobby R. Burchfield". The signature is fluid and cursive, with a long horizontal stroke at the end.

Bobby R. Burchfield

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Federal Election Commission
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